UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

JOHN ACE JONES,	
INDIVIDUALLY AND ON BEHALF	
OF ALL OTHERS SIMILARLY	
SITUATED,) Case No.: 1:18-cv-05784-AT-CCB
Plaintiff,	CLASS ACTION COMPLAINT
V.) JURY TRIAL DEMANDED
FINANCIAL ASSET)
MANAGEMENT SYSTEMS, INC.	,
Defendant.)

Declaration of Clifford Carlson

I, Clifford Carlson, declare under penalty of perjury, as provided for by the laws of the United States, 28 U.S.C. § 1746, that the following statements are true:

1. I am a member in good standing of the bars of the following courts:

Georgia Supreme Court (2016)

Georgia Court of Appeals (2015)

Middle District of Georgia (2013)

Northern District of Georgia (2016)

Texas Supreme Court (2012)

- 2. I am a 2012 graduate of the Walter F. George School of Law and have been employed at Cliff Carlson Law, P.C. since that time.
- 3. I have been involved in more than 100 consumer cases including (without limitation):

C&F Finance Company v. Adams, 17V-8097

Crisp Regional Hospital v. Allen, 17-0222CS

Midland Funding, LLC v. Blunt, 2016 MW 0156 0139

Blunt v. Advance Bureau of Collections LLP et al, 5:16-cv-00504

Brown v. Portfolio Recovery Associates LLC, 5:17-cv-00187

Brown v. SWC Group LP, 1:17-cv-02277

Collection Receivables Inc. v. Calhoun, 17MAG1123

Champagne v. Optimum Outcomes Inc., 5:15-cv-00031

Champagne v. Cavalry SPV I, LLC, 5:15-cv-00040-MTT

Champagne v. Jefferson Capital Systems, LLC, 5:16-cv-00131-MTT

Cavalry SPV I, LLC v. Kristina Chance, 2014-V-111818-N

Chaney v. Consumer Portfolio Services, Inc, et al, 5-16-cv-00476

Midland v. Chauvaux, 153330

Chauvaux v. Midland, 4:16-cv-337

Chauvaux v. NPAS, Inc., 4:16-cv-00331

Clairborne, v. Portfolio Recovery Associates, LLC, 5:17-CV-65

Cofield v. Midland Credit Management, Inc., 14-835CS

Midland Funding, LLC v. Cofield, 13V-7012

Citibank, N.A. v. Cofield, 12V-6528

LVNV Funding v. Cross, 2016 MW 0159 0439

Cross v. Sherman Originator, et al, 5:17-cv-00163

Daniels v. Midland Credit Management, Inc., 2014M W 145-323

Daniels v. Retrieval-Masters Creditors Bureau, Inc., 5:17-cv-0013

Davis v. Midland Funding, LLC, 2015-MV-2699

Midland Funding, LLC v. Davis, 2014MW144-141

Davis v. Medicredit, 5:15-cv-00042

Davis v. Van Ru, 5:16-CV-8(LJA)

Davis v. Portfolio Recovery Associates, 2016 MW 155 568

Davis v. Midland Funding LLC, 2015 MW 0151 0303

Davis v. Portfolio Recovery Associates, 5:17-cv-00191

Portfolio Recovery Associates v. Davis, 2016-CV-065498

Portfolio Recovery Associates v. DeShazier, 16003468-S-00

Dickey v. Portfolio Recovery Associates, 1:17-cv-01839

Midland Funding, LLC v. Ellington, 2015 MW 0153 0898

English v. Midland Credit Management, 2014MW145-475

Columbus Bank & Trust v. English, 2017-MW-163-051

Portfolio Recovery Associates LLC v. Foster, 2015MW153-250

Discovery Bank v Foster, 15-V-49057

Cavalry SPV 1 v. Foster, 2015 MW 0154 0427

Gallo v. Praxis Financial Solutions, Inc., 2014 MW 147 576

Giles v. RGL Associates, Inc. 1:16-cv-04816

Midland Funding, LLC v. Gonzalez, 2015 MW 0154 0570

4. I have attended the following seminars relevant to my practice areas:

Fair Debt Collection Practices Act Bootcamp, Minneapolis, Minnesota (September 2016)

NACA Fair Debt Collection Practices Act Annual Conference, New Orleans, Louisiana (March 2017)

NCLC Fair Credit Reporting Act Annual Conference, Baltimore, Maryland (April 2017)

NACA Fair Debt Collection Practices Act Annual Conference, Chicago, Illinois (March 2018)

NACA Fair Debt Collection Practices Act Annual Conference,

Las Vegas, Nevada (March 2019)

NCLC Fair Credit Reporting Act Annual Conference, Long Beach, California (May 2019)

5. I am a member of the following voluntary bar associations relevant to my practice:

National Association of Consumer Bankruptcy Attorneys

National Association of Consumer Advocates

Consumer Law Section, State Bar of Georgia

Dated September 25, 2019.

/s/ Clifford Carlson Clifford Carlson Georgia Bar No. 227503

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